

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ROBERT P. GOODRICH,

Petitioner,

v.

TIM HALL,

Respondent.

Civil Action No. 03-12541-NG

2004 AUG 26 P 1:24

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**ASSENTED-TO MOTION  
FOR EXTENSION OF TIME TO FILE  
RESPONDENT'S MEMORANDUM OF LAW**

The respondent, Tim Hall, respectfully requests that this Court grant him an additional three (3) days (until and including September 3, 2004) in which he may file his memorandum of law in opposition to the petitioner's petition for a writ of habeas corpus. As grounds for this motion, the respondent states that between this date and the requested extension date, undersigned counsel is also responsible for preparation and filing memoranda of law in two other federal habeas corpus cases, namely *Tajien White v. Commonwealth*, United States District Court Civil Action No. 03-12388-RGS, *Jordan Martell Rice v. Tim Hall*, United States District Court Civil Action No. 04-10859-MLW. Due to the press of these other matters, and in light of the complex legal issues raised in the petitioner's memorandum, the additional three (3) days are required for preparation and review of this brief.

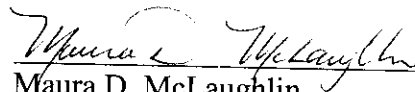
In addition, counsel for the petitioner has assented to the motion for the additional days, and granting the motion will not cause any delay in this case. Pursuant to an earlier order of this

Court, the petitioner's reply brief, if any, is to be filed on September 30, 2004. Granting the instant motion is not expected to necessitate any change in the date this matter will be briefed in full before this Court.

WHEREFORE, the respondent respectfully requests that this Court grant him an additional three (3) days, until and including September 3, 2004, to file his memorandum of law.

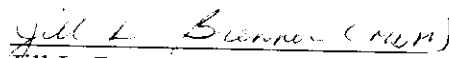
Respectfully submitted,

THOMAS F. REILLY  
ATTORNEY GENERAL

  
Maura D. McLaughlin  
Assistant Attorney General  
Criminal Bureau  
One Ashburton Place  
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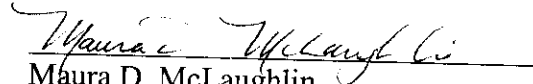
Dated: August 25, 2004

Assented:

  
Jill L. Brenner, Esq.  
Counsel for the petitioner  
Connelly, Conroy & Gelhaar  
One Beacon Street, 33rd Floor  
Boston, Massachusetts 02108

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon counsel for the petitioner, Robert P. Goodrich, on August 25, 2004, by depositing the copy in the office depository for collection and delivery by first-class mail, postage pre-paid, to Jill L. Brenner, Esq., counsel for the petitioner, Connelly, Conroy & Gelhaar, One Beacon Street, 33rd Floor, Boston, Massachusetts 02108.

  
Maura D. McLaughlin